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## MEMO ENDORSED

June 6, 2023

Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

The application to modify the condition of bail from home detention to curfew as directed by Pretrial Services is granted.  
SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 6/12/2023

New York, New York

Re: *United States v. Stanislav Yakubov*, 22 Cr. 206 (ER)

Dear Judge Ramos:

On February 1, 2023, Mr. Yakubov was convicted following trial of one count of participating in a conspiracy to commit money laundering and two counts of making false statements to federal law enforcement officers. Following the conviction, the Court imposed a pre-sentence condition of home detention with exceptions for work, religious services, medical appointments, and meetings with counsel.

I write to respectfully request a modification of Mr. Yakubov's bond to replace the condition of home detention with a curfew. Mr. Yakubov's father was recently diagnosed with colon cancer and had surgery earlier this week. A curfew would allow Mr. Yakubov to visit his father at home and assist with his recovery. It would also enable him to pick up his children from school and attend religious services without the burden on Pretrial Services of accommodating his frequently changing schedule.

Pretrial Services requests this modification and asks for authority to set the curfew hours. The government objects on the ground that Mr. Yakubov is a potential flight risk. Respectfully, Mr. Yakubov presents little, if any, risk of flight as he has a large extended family in New York and is the primary breadwinner and source of support for his wife and four children, all under the age of 16. Thank you for your consideration.

Respectfully submitted,

/s/

Deborah Colson  
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cc: Government Counsel  
Pretrial Officer Dominique Jackson